

08-48

Counterforce
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 www.counterforceusa.com

COUNTERFORCE

A UTC Fire & Security Company

March 19, 2008

Received & Inspected

MAR 28 2008

FCC Mail Room

Via CMRR 7006 2150 0004 6193 3597And UPS Overnight Mail:

Office of the Secretary
 FCC
 445 12th Street SW
 Room TW-A325
 Washington, DC 20554

Via CMRR 7006 2150 0004 6193 3603And UPS Overnight Mail:

Network Services Division
Wireline Competition Bureau
 FCC
 445 12th Street SW
 Room 6-A207
 Washington, DC 20554

Re: CTI/StarVox Communications, Inc.

Dear Sirs:

We are in receipt of the letter March 17, 2008 from CTI/StarVox Communications regarding their discontinuance of telecommunications services to their customers nationwide. A copy of this letter is attached as Exhibit A. Counterforce is a customer of CTI/StarVox which will be affected by this change.

Counterforce, Inc. is a security monitoring company which monitors over 150,000 burglar, fire, panic, and medical alarm accounts across all fifty states and Puerto Rico. CTI currently services approximately 90% of our customers. Counterforce relies on telephone lines as the primary means of linking customers' alarm systems with our monitoring center. Should telephone service be interrupted, our customers would lose the protections they rely on and have contracted with us to provide. At Counterforce we strive to secure lives and provide peace of mind to our customers.

Counterforce has taken steps to have an alternate carrier to take over telephone lines with our customers. However, the thirty (30) day time frame provided by CTI will not be sufficient time to transfer the large volume of telephone lines Counterforce currently has with CTI.

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Any service interruption related to losing telephone service would leave Counterforce customers without the protections they pay Counterforce to provide. It would also result in significant financial and legal liability for Counterforce. Given the impact on our customers and our business, we ask that the FCC contact CTI to provide us an additional 60 days to migrate our traffic.

We look forward to your response to our request or other solutions to this issue. Please feel to contact me at 713-652-8899 or contact Marina Ramos at 713-652-8881 with any questions you may have.

Respectfully Yours,

A handwritten signature in black ink, appearing to read "Mike Slauson", written over a horizontal line.

Michael M. Slauson
General Manager
Counterforce, Inc.



Capital Telecommunications, Inc.

Voice, Data, Internet, Wireless.

March 17, 2008

«Name»
«Address 1», «Address 2»
«City», «State», «Zip»

IMPORTANT NOTICE - URGENT - Your action is required. You must subscribe to a telephone service provider other than CTI/Starvox prior to the end of the thirty (30) day period from the date above or you will not have access to the services currently available to you through CTI/Starvox.

Dear Valued Customer:

Last month, we notified you that CTI and Starvox Communications ("CTI/Starvox") had entered into an agreement to transfer CTI/Starvox customers to bComm, Inc. ("bComm"). We also noted that we would update you with any development or details regarding the discontinuance of your service by CTI/Starvox. The purpose of this letter is to inform you that the agreement with bComm will not be consummated. Instead, if you haven't already, you will need to find a new service provider for your local or long distance, internet or data communications needs.

Effective thirty (30) days after the date of this letter, or as soon thereafter as the necessary regulatory approvals are obtained, CTI/Starvox will be discontinuing your telecommunications services. This discontinuance affects service in all states in which CTI/Starvox provides telecommunications service. This notice clarifies and supersedes any previous communications on this issue.

CTI/Starvox will cooperate with you through the date of discontinuance concerning the transition of your telephone service to an alternative carrier of your choice and will assist you in transitioning your existing local telephone number(s) where permitted. Please consult your local telephone directory or the incumbent local exchange carrier(s) in your area for a list of other possible providers. Should you need our assistance, please contact us at 800-673-2400. We regret to inform you that certain underlying vendors of critical services have threatened to cease providing service to CTI/Starvox. If any such vendor stops providing service, the effect could be to render us unable to provide service to you for reasons beyond our control even before the thirty (30) day period has expired. Thus, it is vital that you obtain service from a substitute provider immediately.

The FCC will normally authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments within fifteen (15) days after receipt of this notification. Address them to the Federal Communications Commission, Washington, DC 20534, referencing the §83.71 Application of CTI/Starvox Communications Inc. Comments should include specific information about the impact of this proposed discontinuance upon you or your company, including any inability to acquire reasonable substitute service.

CTI/Starvox appreciates your business, and we regret that we will no longer be providing your telephone services. It has been our pleasure serving you.

CTI/Starvox Communications, Inc.

200 West Market Street • York, PA 17401 • www.captel.com
phone: 717-848-8800 • toll-free: 800-673-2400 • fax: 717-848-8806
CTI is a wholly owned subsidiary of StarVox Communications, Inc.

Exhibit "A"